

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IMMERSION CORPORATION,)	
)	
Plaintiff,)	
)	Case No. 1:23-cv-00623-ADA
v.)	
)	JURY TRIAL DEMANDED
META PLATFORMS, INC., F/K/A)	
FACEBOOK, INC.,)	
)	
Defendant.)	

**JOINT MOTION TO STAY CASE DEADLINES PENDING FINALIZATION OF
SETTLEMENT AGREEMENT**

On January 12, 2024, Plaintiff Immersion Corporation (“Immersion”) and Defendant Meta Platforms, Inc. (“Meta”) (collectively the “Parties”), reached an agreement in principle to resolve the above-captioned matter and its related proceedings in their entirety. On the same day, the Parties contacted the Court via email to advise of their pending settlement.

In light of the agreement in principle, and to permit the Parties time to finalize the terms of their settlement agreement, the Parties hereby respectfully request that the Court stay all case deadlines. The Parties thus submit this Joint Motion to Stay Case Deadlines Pending Finalization of Settlement Agreement and a Proposed Order granting the Motion.

The Parties agree that no later than January 31, 2024, the Parties will file either (1) papers dismissing both the above-captioned matter, and Case No. 1:23-cv-01386 also pending before this Court;¹ or (2) a status report apprising the Court of expected timing regarding the same.

¹ Immersion has not yet served Meta with its complaint in Case No. 1:23-cv-01386, and thus no deadlines are required to be stayed.

Dated: January 16, 2024

Respectfully submitted,

/s/ Stefan Szpajda

Stefan Szpajda, WA Bar No. 50106
Cristofer I. Leffler, WA Bar No. 35020
David Schumann, CA Bar No. 223936
C. Maclain Wells, CA Bar No. 221609
(Admission *pro hac vice* pending)
Sam Kim, CA Bar No. 282582
Palani Pradeep Rathinasamy, CA Bar No.
269852
Cliff Win, Jr., CA Bar No. 270517
Steven Skelley, WA Bar No. 53017
FOLIO LAW GROUP PLLC
1200 Westlake Ave. N., Suite 809
Seattle, WA 98109
Tel: (206) 880-1802
Email:

stefan@foliolaw.com
cris.leffler@foliolaw.com
david.schumann@foliolaw.com
maclain@foliolaw.com
sam.kim@foliolaw.com
palani@foliolaw.com
cliff.win@foliolaw.com
steve.skelley@foliolaw.com

Joseph M. Abraham, TX Bar No. 24088879
Timothy F. Dewberry, TX Bar No. 24090074
FOLIO LAW GROUP PLLC
13492 Research Blvd., Suite 120, No. 177
Austin, TX 78750
Tel: (737) 234-0201
Email: joseph.abraham@foliolaw.com
timothy.dewberry@foliolaw.com

Attorneys for Immersion Corporation

/s/ Phillip E. Morton

Heidi L. Keefe (CA Bar 178960)
Dena Chen (CA Bar 223989) (Admitted *pro hac vice*)
Elizabeth L. Stameshkin (CA Bar 260865)
(Admitted *pro hac vice*)
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304
Telephone: (650) 843-5000
Email:
hkeefe@cooley.com
dchen@cooley.com
lstameshkin@cooley.com

Phillip E. Morton (VA 71299) (Admitted *pro hac vice*)
COOLEY LLP
1299 Pennsylvania Ave. NW, Suite 700
Washington, DC 20004
Telephone: (202) 842-7800
Email: pmorton@cooley.com

Deron R. Dacus (TX Bar #00790553)
THE DACUS FIRM, P.C.
821 ESE Loop 323, Suite 430
Tyler, TX 75701
Telephone: (903) 705-1117
ddacus@dacusfirm.com

Attorneys for Defendant Meta Platforms, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on this the 16th day of January, 2024 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(b)(1).

/s/ Stefan Szpajda

Stefan Szpajda